Case: 1:08-cv-04883 Document #: 1010-4 Filed: 09/27/12 Page 1 of 4 PageID #:13295

### **EXHIBIT 3**

### **Affidavit**

I, Allisson Knoll, Paralegal, an employee in the New York office of PR Newswire Association LLC, hereby certify that the attached notice, with the headline "If You Purchased Automotive Filters From a Retailer, Your Rights Could Be Affected By a Class Action Settlement", was distributed on June 29, 2012 via PR Newswire's US1 distribution list and was posted on PR Newswire's public website, <a href="https://www.prnewswire.com">www.prnewswire.com</a>.

Notary Public State of New York
No. 01CL6256273
Qualified in New York Commission Expires Esb. 21 2016.

Case: 1:08-cv-04883 Document #: 1010-4 Filed: 09/27/12 Page 3 of 4 PageID #:13297

# If You Purchased Automotive Filters From a Retailer, Your Rights Could Be Affected By a Class Action Settlement

Legal Notice

# If You Purchased Automotive Filters From a Retailer, Your Rights Could Be Affected By a Class Action Settlement

Para una notificación en Español, llamar o visitar nuestro website

CHICAGO, IL, June 29, 2012—The United States District Court for the Northern District of Illinois authorized this, and other forms of notice, as part of a notification program to inform persons and entities that purchased automotive filters from a retailer about their legal rights in a class action settlement.

Settlements have been reached with Champion Laboratories, Inc. ("Champion"), Purolator Products NA, LLC, Purolator Products Company, LLC, ArvinMeritor, Inc. ("Purolator"), Honeywell International ("Honeywell"), Wix Filtration Corp. LLC ("Wix"), Affinia Group Inc. ("Affinia"), Cummins Filtration Inc. ("Cummins"), Donaldson Company, Inc. ("Donaldson"), and Baldwin Filters, Inc. ("Baldwin") ("Defendants") about the prices of automotive and light truck oil, air, and fuel filters ("Filters"). The value of the Indirect Purchaser Class Settlement is \$6,018,750 ("Settlement Fund").

### What Are The Settlements About?

Plaintiffs claim that Defendants violated U.S. antitrust laws and the laws of AZ, AR, CA, DC, FL, HI, IL, IA, KS, ME, MI, MN, MS, MA, NE, NV, NH, NM, NY, NC, ND, PR, RI, SD, TN, UT, VT, WV, WI, and WY (the "states"), by conspiring to fix Filter prices. Defendants deny liability but settled to avoid litigation burdens.

#### Who Is A Class Member?

You are a class member if, while residing in one of the states, you, between January 1, 1999 and March 8, 2012 ("Class Period"), purchased Defendants' Filters for your own use from: Advance Auto Parts Inc., Ashland, Inc., Autozone, Inc., Bridgestone Retail Operations, LLC d/b/a Firestone Complete Auto, General Parts, Inc., Genuine Parts Company, Goodyear Tire & Rubber Company d/b/a Goodyear Gemini Automotive Care, Jiffy Lube International, Inc., Midas, Inc., O'Reilly Automotive, Inc., Pennzoil-Quaker State Company, The Pep Boys-Manny, Moe & Jack, Sears, Roebuck & Co., Texaco, Inc., and Wal-Mart Stores, Inc., or their parents, affiliates, subsidiaries, d/b/a's, predecessors or successors in interest.

Plaintiffs do not allege that these retailers engaged in any misconduct.

Plaintiffs in certain states have a shorter Class Period than indicated above. Those states include: NE (January 1, 2002 to March 8, 2012), NH (January 1, 2008 to March 8, 2012), UT (January 1, 2006 to March 8, 2012) and WY (January 1, 2006 to March 8, 2012).

### Will I Get A Payment?

No. Payment to individual class members is not practical because of the associated costs. The Settlement Fund will be distributed to charities or other beneficiaries approved by the court that best represent the Class' interests. Further information regarding these charities and other beneficiaries will be available on the settlement website.

### What Are My Rights?

If you do not want to take part in the Settlements, you have the right to opt out. To opt out, you must do so by 9/3/2012. If you do not opt out, you will release certain legal rights against Defendants, as described in the settlement agreements. Class members have the right to object to the Settlements. If you object to any of the Settlements, you must do so by 9/3/2012. You may speak to your own attorney at your own expense.

Case: 1:08-cv-04883 Document #: 1010-4 Filed: 09/27/12 Page 4 of 4 PageID #:13298

A Final Approval Hearing to consider Settlement approval and a request for litigation expenses incurred, attorneys' fees of up to one-third of the Settlement Fund, and an incentive award of up to \$500 for each class representative is at 10:00 a.m. on 10/4/2012, at the United States District Court for the Northern District of Illinois in Courtroom 1703. The date, courtroom, time and location may change.

### Where Can I Get More Information?

This Legal Notice is not a complete description of the case, Settlement terms, approval process, or your rights. For more information, please visit <a href="www.IndirectPurchasersFilterSettlement.com">www.IndirectPurchasersFilterSettlement.com</a> or contact: Indirect Purchasers Filter MDL, PO Box 2009, Chanhassen, MN 55317-2009, 1-866-224-5376

PRESS CONTACT: James Anderson, Esq., Heins Mills & Olson, PLC, 612-338-4605

URL: www.IndirectPurchasersFilterSettlement.com

SOURCE: Heins Mills & Olson, PLC